

A Presentation to the Washington State
Ecological Commission Meeting in
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Hazardous Waste Disposal Site, Pasco, Washington

One of the most perplexing of all waste disposal problems in the state is that of those substances generally referred to as hazardous or toxic wastes. These substances include such things as radioactive wastes, pesticides, insecticides, chemical solutions, chemical sludges, oils, paints, to name a few. Due to their very nature they cannot be safely discharged to ground or surface waters, municipal or storm sewers. Generally speaking, excluding those few instances where specific industrial treatment facilities have been constructed for certain of these wastes, most of them enter our dumps, old gravel pits or sanitary landfills in unknown amounts and nature.

The only sites in the State of Washington which have been designated as being capable of adequately handling these hazardous wastes are Western Processing in Kent and Resource Recovery Corporation in Pasco. The Kent operation receives chemicals and chemical sludges from the greater Seattle area for reclamation and/or treatment for ultimate reuse or resale of the material. Operation and maintenance of this site is authorized and controlled through a waste discharge permit issued by the Department of Ecology.

The Resource Recovery site likewise has a waste discharge permit issued by the Department of Ecology for operation and maintenance and it is this operation and the history behind it which shall be discussed in detail.

In 1969 a Seattle firm, Chemical Processors, Inc., began looking in the Benton County area for a possible site for the location of a hazardous waste disposal operation to be similar in concept to that of Western Processing. This search led to some land on the Atomic Energy Commission's Hanford Project. However, in December of 1971, the AEC indicated to Chempro that the Hanford land would not be available to them for a hazardous waste disposal site. An alternative site was then proposed at Badger Canyon, which ultimately was rejected due to adverse public reaction at the Benton County Planning Commission hearing on the proposal. At about this time, February of 1972, Chempro was approached by Basin Disposal Company of Pasco with an offer to conduct the operation adjacent to the sanitary landfill site run by Basin Disposal, north and east of Pasco. Prior to this time the site had been identified by the Benton-Franklin Health District as acceptable for the disposal of pesticides and their containers. Negotiations at this point in time were primarily between Chempro and the Benton-Franklin Health District since categorically these hazardous wastes were defined as solid wastes and, therefore, under jurisdiction of local county health departments. In March of 1972, Chempro notified the Benton-Franklin Health District that paint sludges from Chempro's Seattle operation would be the first wastes disposed of by them at the Pasco site.

In a letter to the Health District dated September 5, 1972, Chempro submitted an operational plan for the overall industrial waste disposal operation at the site; announced the formation of a new corporation to own, operate, and manage this new venture. Resource Recovery Corporation; and indicated the new project was in compliance with Franklin County Zoning ordinances. At about this time our Department indicated to Resource Recovery Corporation that they would be required to obtain a permit from the Department for operation and maintenance of the site under the waste discharge permit provision of the Water Pollution Control Law, RCW 90.48.160. On October 31, 1972, we met with Resource Recovery Corporation to discuss the requirement.

In summary the operation was initially to consist of the disposal of waste acid and alkaline solutions, spent plating and metal finishing solutions, and wood treating wastes, all to be placed in lined ponds for evaporation, concentration, storage and ultimate reclamation. Each general category of waste would be placed in its own pond, which, when full of the concentrated, dried sludge, would be covered and capped with an impervious liner, marked and left for ultimate recovery. In a way the operation was to be similar to a large cemetery for hazardous wastes. Under each pond moisture sensors would be placed to detect leaks should any occur, since the concept of the operation was for a totally contained storage system. On February 26, 1973, in compliance with the State Environmental Policy Act of 1971, a negative declaration was made by the Department prior to our action on Resource Recovery's permit application to the Department. On March 21, 1973, the subject permit, No. 5301, was issued to Resource Recovery Corporation, which outlined conditions under which the site was to be run, including reporting of waste volumes received by month. Moisture sensor data and test well information were also to be included in the report.

As previously stated, the site had been identified as suitable for pesticides, herbicides, insecticides and other related substances. Resource Recovery, using this as a basis, entered into an agreement with Rhodia Corporation of Portland, Oregon, to dispose of, at the Pasco site, 55 gallon drums of 2,4-D tars from the manufacture of the herbicide 2,4-D. This import began late in the year 1972, and was to operate under the following conditions:

1. The drums were to meet Department of Transportation "new" classifications,
2. There were to be no leaks or flaws,
3. There was to be an expansion allowed in each drum of 7 gallons.

In July of 1973, the State of Washington Department of Agriculture expressed concern over the fact that 2,4-D was being stored at the site and on August 9, 1973, a meeting was held to inspect the operation with representatives of the Departments of Ecology, Agriculture and the Benton-Franklin Health District. The only significant alteration to the then existing operation was that from April 1 to September 1, no 2,4-D would be brought to the site, which corresponds

to that period of time when grape plants are most susceptible to damage from 2,4-D. At about this time the Department of Agriculture set up air monitoring impingers and planted some grape plants at the site, and, as we understand, no 2,4-D was detected and no damage was observed to the grape plants. This is perhaps not too surprising since the drums are buried under four feet of soil. Upon receipt the drums are stacked, three high, in a trench and covered. This serves to keep the drum temperatures cool during the hot summer days which reduces volatilization possibilities of the 2,4-D sludge.

Of course by this time considerable public sentiment was being aroused on two separate fronts. The first question was that of adequacy at the disposal methods; the second was that of the sites' existence in the first place. It soon became obvious that the ordinances at Franklin County were not, according to the County Commissioners, being complied with, and, that a special use permit which would have authorized the operation, had not been obtained. We met to discuss these matters with the County Commissioners on September 18, 1973. Shortly thereafter it was decided by the Department to conduct an in-depth survey of the operation to determine, from actual operating field data, what environmental or potential environmental problems existed at the site after about a full years' operation. This kind of survey is certainly not unique in its concept, for when the Department issues such permits for waste disposal projects, it does so based on the adequacy of the design information in relation to compliance with Departmental standards and guidelines. It then becomes a matter of field checking actual operating data and conditions with respect to these regulatory parameters. At the present time this investigation is in the data accumulation and verification stage. To be covered in the report, which ultimately will be prepared, are such things as the background of the problem, history of the site, geologic and hydrologic data, waste analysis, disposal analysis, and the potential air and ground water problems. Because the initial area of concern was the storage of 2,4-D, the Department of Ecology, on October 11, 1973, issued a Notice of Violation to Resource Recovery Corporation requiring the cessation of 2,4-D import to the Pasco site until the aforementioned investigation was completed, which, we understand, has been agreed to by the company.

The question of the sites' existence, at its present level of operation, will be discussed at a County Commissioners hearing on November 7, 1973, by which time we will have what amounts to a preliminary report available for the Commissioners, which will simply document the present status of the company's operation from our initial review of all pertinent data. We will be meeting with a three man committee appointed by the Franklin County Commissioners, including one Commissioner, to review this information prior to the November 7 hearing. This same three man team will be part of our overall investigative team from which we hope for input into the investigation. Included in the team in addition to Department of Ecology personnel will be representatives of the Departments of Agriculture and Social and Health Services, and the Benton-Franklin Health District. Collectively we hope to look at all aspects of Resource Recovery's operation and conclude our investigation with a definitive report with recommendations as to possible changes or modifications in the operation. At this time, however, the decision as to whether or not wastes from the Metropolitan areas

of Seattle, Tacoma and Portland are brought into Franklin County rests with the Department of Ecology Commissioners. What happens next will depend a lot on the upcoming hearing before the Commissioners.